

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

NATHAN M. POKE,

Plaintiff,

V.

Case No. 19-CV-33

CITY OF LA CROSSE, WISCONSIN and
RON TISCHER,

Defendants.

**AFFIDAVIT OF ROBERT ABRAHAM IN SUPPORT OF
DEFENDANTS' MOTION FOR PROTECTIVE ORDER**

[illegible]


Robert Abraham, being first duly sworn on oath, deposes and states as follows:

1. I am the Assistant Chief of Police for the City of La Crosse Police Department.
2. The Information and Technology ("IT") Department for the City of La Crosse Police Department scanned department files for the names "Poke" and "Clark."
3. The IT Department found approximately fifty seven thousand, four hundred and seventeen (57,417) emails with either the name "Poke" or "Clark."

Dated this 17th day of June, 2019.

Robert Abraham

Subscribed and sworn to before me
this 18th day of June, 2009


Notary Public, State of Wisconsin
My commission expires 2/20/12

